

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

GREGORY GOODWIN)	
)	
Plaintiff,)	Civil Action No. 05-161 (Erie)
)	
v.)	Judge Maurice B. Cohill, Jr.
)	
ACCURIDE ERIE, LP)	
)	Electronically Filed
Defendant.)	

MOTION, WITH OPPOSITION, FOR EXTENSION OF DISCOVERY

AND NOW COMES Plaintiff, Gregory Goodwin, by and through his counsel, Joseph H. Chivers, Esquire, and hereby respectfully requests an extension of discovery in the above matter.

Discovery in this case closes April 30, 2006. However, important discovery remains to be taken, in particular, depositions of Plaintiff and several of Defendant's fact witnesses. Plaintiff cannot reasonably complete these depositions by April 28, 2006, and requests a reasonable extension to complete them.

WHEREFORE, in order to complete discovery, Plaintiff respectfully requests an extension of the discovery deadline thirty (30) days, or until May 30, 2006. Counsel for Defendant has been consulted and opposes this extension. A proposed order is attached.

Respectfully submitted,

s/Joseph H. Chivers, Esquire
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Counsel for Plaintiff
Gregory Goodwin

Dated: April 12, 2006